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COUNTY OF ALAMEDA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LISAMARIA MARTINEZ,

Plaintiff,

v.

COUNTY OF ALAMEDA,

Defendant.

Case No. 20-cv-06570-TSH

**DEFENDANT COUNTY OF ALAMEDA'S  
[PROPOSED] VERDICT FORM**

PTC: February 15, 2024  
TIME: 10:00 a.m.  
DEPT: Courtroom G, 15th Floor  
JUDGE: Hon. Thomas Hixson  
TRIAL: March 25, 2024

Defendant COUNTY OF ALAMEDA hereby submits its [Proposed] Verdict Form.

Dated: January 25, 2024

Respectfully submitted,

**ORBACH HUFF + HENDERSON LLP**

By: /s/ Kevin E. Gilbert

Kevin E. Gilbert

Nicholas D. Fine

Attorneys for Defendant

COUNTY OF ALAMEDA

ORBACH HUFF & HENDERSON LLP

**[PROPOSED] JURY VERDICT FORM**

WE, THE JURY in the above-entitled action, find as follows on the questions submitted to us:

**Question 1.** Has Plaintiff proven by a preponderance of the evidence that Plaintiff was unable to effectively communicate with the County's employees during her visit to the CRO on March 29, 2019? (Check "Yes" or "No".)

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" please go to Question 2. If you answered "No" stop here, answer no further questions and sign and date this verdict form.*

**Question 2.** Has Plaintiff proven by a preponderance of the evidence that she was denied participation in, or the benefits of, the CRO's services, programs, or activities on March 29, 2019, on account of the ineffective communication? (Check "Yes" or "No".)

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" please go to Question 3. If you answered "No" stop here, answer no further questions and sign and date this verdict form.*

**Question 3.** Has Plaintiff proven by a preponderance of the evidence that Plaintiff requested a reasonable accommodation from the County on March 29, 2019, in order to participate in, or receive the benefits of, the CRO's services, programs, or activities? (Check "Yes" or "No".)

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" please go to Question 4. If you answered "No" stop here, answer no further questions and sign and date this verdict form.*

**Question 4.** Has Plaintiff proven by a preponderance of the evidence that the County failed to provide Plaintiff with reasonable accommodations on March 29, 2019, to allow Plaintiff to participate in, or receive the benefits of, the CRO's services, programs, or activities? *(Check "Yes" or "No".)*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" please go to Question 5. If you answered "No" stop here, answer no further questions and sign and date this verdict form.*

**Question 5.** Is the County's implementation of a computer kiosk with electronic forms and screen-reader software, coupled with human assistance provided by CRO personnel, a reasonable accommodation? *(Check "Yes" or "No".)*

Yes \_\_\_\_\_ No \_\_\_\_\_

*Please go to Question 6.*

**Question 6.** Has Plaintiff proven by a preponderance of the evidence that the County's employees were deliberately indifferent to Plaintiff due to her disability on March 29, 2019? *(Check "Yes" or "No".)*

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "Yes" please go to Question 7. If you answered "No" stop here, answer no further questions and sign and date this verdict form.*

**Question 7.** What damages has Plaintiff proven by a preponderance of the evidence?

\$ \_\_\_\_\_

*Please date and sign this verdict form below and return it to the Court. Thank you.*

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Jury Foreperson

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